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September 20, 2010

Letter sent via email.

The Honorable Phil Sharp
Co-Chairman
Blue Ribbon Commission
Transportation and Storage Subcommittee
1800 K Street, N.W., Suite 1014
Washington, D.C. 20006

The Honorable Richard A. Meserve
Co-Chairman
Blue Ribbon Commission
Transportation and Storage Subcommittee
1800 K Street, N.W., Suite 1014
Washington, D.C. 20006

Dear Representative Sharp and Commissioner Meserve:

The members of the Nuclear Waste Strategy Coalition (NWSC) are encouraged that the Blue Ribbon Commission Transportation and Storage Subcommittee, continues to hear from Federal, State and local officials, industry representatives and others, of their expertise in siting interim storage facilities and transportation relating to the shipment of spent nuclear fuel (SNF) and high-level radioactive waste (HLRW) currently stranded in 121 sites in 39 states.

Again, we are encouraged that the Transportation and Storage Subcommittee, is learning first-hand the issues operating reactor sites and decommissioned plants are faced with on a daily basis.

As stated previously, the NWSC believes that an effective disposal program should consist of a permanent repository; an integrated transportation plan; and centralized interim facilities that advance and complement the permanent repository while addressing near-term needs. The NWSC reiterates though that centralized interim storage is not a substitute for a permanent repository and should be considered as a short-term solution only.

Therefore, we call upon the Transportation and Storage Subcommittee to immediately recommend to the DOE to re-implement its transportation plan to remove nuclear waste currently stranded at decommissioned reactor sites and operating reactor sites for consolidation at locations that volunteer to host SNF and HLRW storage facilities.

We also urge the Transportation and Storage Subcommittee to recommend the construction of a centralized interim storage facility or facilities, involving consensus among the Federal government, state and local officials, stakeholders and local communities, as well as sustainable support for the siting and operation of such an interim facility. We should learn from history and ensure that the nuclear waste disposal program funds are fully utilized and directed at solving the nation's nuclear waste problem.

Meanwhile, the nation's ratepayers are paying more than \$770 million annually into the Nuclear Waste Fund (NWF). Ratepayers from 41 states have already paid more than \$34 billion, including interest, into the NWF, for the removal of SNF and HLRW during this generation, and we should not pass this problem on to future generations – action can and should be taken in the near term to address the nation's nuclear waste problem.

The Department of Energy (DOE) has the responsibility to initiate and carry out its mandate as directed by the 1982 Nuclear Waste Policy Act, as amended. The Federal government has already proved that since 1957 it can safely and successfully move SNF and HLRW throughout the United States.

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According to the Nuclear Regulatory Commission, NUREG-0725, Revision 14, 2.1.3., ***"The safety record for spent fuel shipment in the U.S. and in other industrialized nations is enviable. Of the thousands of shipments completed over the last 30 years [or so], none has resulted in an identifiable injury through release of radioactive material."***

The DOE has already developed and issued a National Transportation Plan for nuclear waste, (DOE/RW 0603 – 2009), that describes how DOE intends to develop and implement a safe, secure and efficient transportation system, and how stakeholder collaboration will contribute to the development of that transportation system. It is long past the time when a national transportation plan for commercial and defense spent nuclear fuel and high-level radioactive waste be implemented. The success of the WIPP program demonstrates that there are not any technical or safety constraints to doing so.

The members of the NWSC thank you for the opportunity to submit our input. We look forward to the opportunity to continue working with and providing further input to the Blue Ribbon Commission Transportation and Storage Subcommittee.

The NWSC is an ad hoc group of state utility regulators, state attorneys general, electric utilities and associate members representing 49 organizations in 32 states. The NWSC was formed in 1993 out of frustration at the lack of progress the Department of Energy had made in developing a permanent repository for SNF and HLRW, as well as Congress's failure to sufficiently fund the nuclear waste disposal program.

Respectfully yours,



David Wright
Commissioner, South Carolina Public Service Commission, and
Chairman, Nuclear Waste Strategy Coalition

C: Mr. Timothy A. Frazier, Blue Ribbon Commission, Department of Energy, Nuclear Energy.